

FILED

ORIGINAL

MELODY A. KRAMER, SBN 169984
KRAMER LAW OFFICE, INC.
9930 Mesa Rim Road, Suite 1600
San Diego, California 92121
Telephone (858) 362-3150
mak@kramerlawip.com

2008 FEB 15 PM 3: 20

CLERK US DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

BY  DEPUTY

J. MICHAEL KALER, SBN 158296
KALER LAW OFFICES
9930 Mesa Rim Road, Suite 200
San Diego, California 92121
Telephone (858) 362-3151
michael@kalerlaw.com

Attorneys for Plaintiff JENS ERIK SORENSEN,
as Trustee of SORENSEN RESEARCH AND
DEVELOPMENT TRUST

'08 CV 0304 JAH WMC

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF CALIFORNIA

JENS ERIK SORENSEN, as Trustee of)	Case No.
SORENSEN RESEARCH AND)	
DEVELOPMENT TRUST,)	NOTICE OF RELATED CASES
)	
Plaintiff)	
v.)	
)	
METABO CORPORATION, a Delaware)	
Corporation; METABOWERKE GMBH,)	
a German Corporation; and DOES 1 –)	
100,)	
)	
Defendants.)	

1 Pursuant to Local Civil Rule 40.1(e), Plaintiff JENS E. SORENSEN, as
2 TRUSTEE OF THE SORENSEN RESEARCH AND DEVELOPMENT TRUST
3 ("SRDT"), hereby gives notice of cases related to the present case. Specifically,
4 SRD TRUST gives notice of the following related cases that all arise from alleged
5 infringement of United States Patent Number 4,935,184 ("the '184 patent"), whether
6 pending, dismissed, or otherwise terminated:

7 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
8 *Trust v. Central Purchasing, LLC, et al.*, filed February 15, 2008 in the United States
9 District Court for the District of Southern California. Plaintiff alleges infringement
10 of the '184 patent by Defendants. Consolidation is not recommended because this
11 related case involves different parties and has different products at issue.

12 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
13 *Trust v. Logitech, Inc., et al.*, filed February 15, 2008 in the United States District
14 Court for the District of Southern California. Plaintiff alleges infringement of the
15 '184 patent by Defendants. Consolidation is not recommended because this related
16 case involves different parties and has different products at issue.

17 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
18 *Trust v. Rally Manufacturing, Inc., et al.*, filed February 15, 2008 in the United
19 States District Court for the District of Southern California. Plaintiff alleges
20 infringement of the '184 patent by Defendants. Consolidation is not recommended
21 because this related case involves different parties and has different products at issue.

22 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
23 *Trust v. Sunbeam Products, Inc., et al.*, filed February 15, 2008 in the United States
24 District Court for the District of Southern California. Plaintiff alleges infringement
25 of the '184 patent by Defendants. Consolidation is not recommended because this
26 related case involves different parties and has different products at issue.

27 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
28 *Trust v. Star Asia, U.S.A., LLC, et al.*, filed February 15, 2008 in the United States

1 District Court for the District of Southern California. Plaintiff alleges infringement
2 of the '184 patent by Defendants. Consolidation is not recommended because this
3 related case involves different parties and has different products at issue.

4 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
5 *Trust v. CTT Tools, Inc., et al.*, Case No. 08cv231, filed February 5, 2008 in the
6 United States District Court for the District of Southern California. Plaintiff alleges
7 infringement of the '184 patent by Defendants. Consolidation is not recommended
8 because this related case involves different parties and has different products at issue.

9 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
10 *Trust v. Global Machinery Company, et al.*, Case No. 08cv233, filed February 5,
11 2008 in the United States District Court for the District of Southern California.
12 Plaintiff alleges infringement of the '184 patent by Defendants. Consolidation is not
13 recommended because this related case involves different parties and has different
14 products at issue.

15 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
16 *Trust v. Emissive Energy Corp., et al.*, Case No. 08cv234, filed February 5, 2008 in
17 the United States District Court for the District of Southern California. Plaintiff
18 alleges infringement of the '184 patent by Defendants. Consolidation is not
19 recommended because this related case involves different parties and has different
20 products at issue.

21 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
22 *Trust v. Alltrade Tools, LLC., et al.*, Case No. 08cv232, filed February 5, 2008 in the
23 United States District Court for the District of Southern California. Plaintiff alleges
24 infringement of the '184 patent by Defendants. Consolidation is not recommended
25 because this related case involves different parties and has different products at issue.

26 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
27 *Trust v. Motorola, Inc., et al.*, Case No. 3:08-cv-0136 LAB RBB, filed January 23,
28 2008 in the United States District Court for the District of Southern California.

1 Plaintiff alleges infringement of the '184 patent by Defendants. Consolidation is not
2 recommended because this related case involves different parties and has different
3 products at issue.

4 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
5 *Trust v. Sanyo North America Corporation, et al.*, Case No. 3:08-cv-0135 DMS
6 POR, filed January 23, 2008 in the United States District Court for the District of
7 Southern California. Plaintiff alleges infringement of the '184 patent by Defendants.
8 Consolidation is not recommended because this related case involves different
9 parties and has different products at issue.

10 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
11 *Trust v. Informatics, inc., et al.*, Case No. 3:08-cv-0134-L NLS, filed January 23,
12 2008 in the United States District Court for the District of Southern California.
13 Plaintiff alleges infringement of the '184 patent by Defendants. Consolidation is not
14 recommended because this related case involves different parties and has different
15 products at issue.

16
17 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
18 *Trust v. Ryobi Technologies, Inc., et al.*, Case No. 3:08-cv-0070-BTM-CAB, filed
19 January 11, 2008 in the United States District Court for the District of Southern
20 California. Plaintiff alleges infringement of the '184 patent by Defendants.
21 Consolidation is not recommended because this related case involves different
22 parties and has different products at issue.

23 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
24 *Trust v. Senco Products, Inc.*, Case No. 3:08-cv-0071-BTM-CAB, filed January 11,
25 2008 in the United States District Court for the District of Southern California.
26 Plaintiff alleges infringement of the '184 patent by Defendants. Consolidation is not
27 recommended because this related case involves different parties and has a single
28 different product at issue.

1 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
2 *Trust v. Emerson Electric Co., et al*, Case No. 3:08-cv-0060-BTM-CAB, filed
3 January 10, 2008 in the United States District Court for the District of Southern
4 California. Plaintiff alleges infringement of the '184 patent by Defendants.
5 Consolidation is not recommended because this related case involves different
6 parties and has different products at issue.

7 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
8 *Trust v. Johnson Level & Tool Mfg. Co., Inc.*, Case No. 3:08-cv-0025-BTM-CAB,
9 filed January 4, 2008 in the United States District Court for the District of Southern
10 California. Plaintiff alleges infringement of the '184 patent by Defendants.
11 Consolidation is not recommended because this related case involves different
12 parties and has different, unrelated products at issue.

13 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
14 *Trust v. Lexar Media, Inc.*, Case No. 5:08-cv-00095-JW, filed January 7, 2008 in the
15 United States District Court for the District of Northern California. Plaintiff alleges
16 infringement of the '184 patent by Defendants. Consolidation is not recommended
17 because this related case involves different parties and has different unrelated
18 products at issue.

19 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
20 *Trust v. Ampro Tools Corporation*, Case No. 4:08-cv-00096-CW, filed January 7,
21 2008 in the United States District Court for the District of Northern California.
22 Plaintiff alleges infringement of the '184 patent by Defendants. Consolidation is not
23 recommended because this related case involves different parties and has different,
24 unrelated products at issue.

25 *PowerStation LLC, et al v. Sorensen Research and Development Trust*, Case
26 No. 07-cv-04167-RBH, filed December 31, 2007 in the United States District Court
27 for the District of South Carolina. Plaintiff seeks declaratory judgment that the '184
28 patent is invalid and not infringed by them, and also makes an unfair trade practices

1 claim. Consolidation is not recommended because case involves different parties
2 and different products, and adds a state law cause of action.

3 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
4 *Trust v. Energizer Holdings, Inc., et al*, Case No. 3:07-CV-2321-BTM-CAB, filed
5 December 11, 2007 in the United States District Court for the Southern District of
6 California. Consolidation is not recommended because this related case involves
7 different parties and has different, unrelated products at issue.

8 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
9 *Trust v. Giant International, Inc., et al*, Case No. 3:07-CV-2121-BTM-CAB, filed
10 November 6, 2007 in the United States District Court for the Southern District of
11 California. Consolidation is not recommended because this related case involves
12 different parties and has different, unrelated products at issue.

13 *Jens Erik Sorensen as Trustee of Sorensen Research and Development Trust v.*
14 *Esseplast (USA) NC, Inc., et al*, Case No. 3:07-cv-2277-BTM-CAB, filed December
15 4, 2007 in this District. Consolidation is not recommended because this related case
16 involves different parties and has different, unrelated products at issue.

17 *Jens Erik Sorensen as Trustee of Sorensen Research and Development Trust v.*
18 *Helen of Troy Texas Corporation, et al*, Case No. 3:07-cv-2278-BTM-CAB, filed
19 December 4, 2007 in this District. Consolidation is not recommended because this
20 related case involves different parties and has different, unrelated products at issue.

21 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
22 *Trust v. First International Digital, Inc., et al*, Case No. 3:07-cv-5525-JSW, filed
23 October 30, 2007 in the United States District Court for the Northern District of
24 California. Consolidation is not recommended because this related case involves
25 different parties and has different, unrelated products at issue.

26 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
27 *Trust v. Digital Networks North America, Inc., et al*, Case No. 3:07-5568-JSW, filed
28 November 1, 2007 in the United States District Court for the Northern District of

1 California. Consolidation is not recommended because this related case involves
2 different parties and has different, unrelated products at issue.

3 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
4 *Trust v. The Black & Decker Corporation, et al*, Civil Case No.: 3:06-CV-1572-
5 BTM-CAB, filed August 7, 2006, in the United States District Court for the Southern
6 District of California. Consolidation is not recommended because this related case
7 involves different parties and has different, unrelated products at issue.

8 *American Safety Razor Co. v. Sorensen Research & Development Trust*, Civil
9 Case No. 07-CV-00730-HHK, filed April 20, 2007, in the United States District
10 Court for the District of Columbia. Consolidation is not recommended because this
11 related case involves different parties and has different, unrelated products at issue.

12 *DMS Holdings, Inc. v. Sorensen Research & Development Trust*. Civil Case
13 No.: 07-CV-02690, filed May 11, 2007, in the United States District Court for the
14 Northern District of Illinois. Consolidation is not recommended because this related
15 case involves different parties and has different, unrelated products at issue.

16 *Jens Erik Sorensen as Trustee of the Sorensen Research And Development*
17 *Trust v. Tecnica USA, Inc and Nordica USA, Inc.*, Civil Case No. 06CV1941 B
18 MLS, filed September 18, 2006 in the Southern District of California. The action
19 was settled by the parties, and dismissed.

20 *Jens Erik Sorensen As Trustee of The Sorensen Research And Development*
21 *Trust v. Head USA Inc.* Civil Case No.: 06CV1434BTN CAB, filed July 2006 in
22 the Federal District for the Southern District of California. The action was settled by
23 the parties, and dismissed.

24 *Head USA Inc. v. Jens Erik Sorensen (As Trustee of The Sorensen Research*
25 *And Development Trust), and Sorensen Research And Development Trust*. Docket
26 No.: 306CV00983, filed June 2006 in the Federal District of Connecticut. The matter
27 was transferred and consolidated with the *Sorensen Research And Development*
28 *Trust v. Head USA Inc.* action filed in the Southern District of California, Civil Case

1 No.: 06CV1434BTM CAB. The action was later settled by the parties, and
2 dismissed.

3 *Nordica USA Corp. v. Jens Ole Sorensen, Jens Erik Sorensen, and Sorensen*
4 *Research and Development Trust*. Docket No. 1:06-cv-91-JM filed March 8, 2006 in
5 the Federal District of New Hampshire. The matter was transferred and consolidated
6 with *Jens Erik Sorensen As Trustee of The Sorensen Research And Development*
7 *Trust v. Tecnica USA, Inc and Nordica USA, Inc.*, Civil Case No. 06CV1941 B
8 MLS, filed in the Southern District of California. The action was later settled by the
9 parties.

10 *Jens Ole Sorensen, and Jens E. Sorensen, as Trustee Of The Sorensen*
11 *Research and Development Trust v. DaimlerChrysler AG, and Mercedes-Benz USA,*
12 *LLC*. Civil No. 03-1763 (HAA) filed in the United States District Court for
13 Northern California and transferred to the United States District Court for New
14 Jersey. This matter has been settled and dismissed.

15 *In the Matter of Certain Automobile Tail Light Lenses And Products*
16 *Incorporating Same*. Investigation No. 337-TA-502 filed in the United States
17 International Trade Commission. The matter was remanded after appeal to the
18 Federal Circuit Court of Appeals, then settled and dismissed.

19 *Jens E. Sorensen, as Trustee Of The Sorensen Research and Development*
20 *Trust v. Premier Automotive Group, Ford Motor Company, and Jaguar, Ltd.* Case
21 No. 03-cv-01107, filed March 14, 2003 in the Federal Court for the Northern District
22 of California. The matter was settled and dismissed.

23 *Lowe's Companies, Inc., et al v. Sorensen Research and Development Trust.*
24 Case No. 05-cv-00234 filed July 29, 2005 in the Federal Court for the Western
25 District of North Carolina. The matter was never served and was dismissed.

26 *Digital Innovations LLC v. Sorensen Research and Development Trust.* Case
27 No. 05-cv-06428, filed November 9, 2005 in the Federal Court for the Northern
28 District of Illinois. The matter was never served and was dismissed.

1 *Big Lots v. Sorensen Research and Development Trust*. Case No. 2:06-cv-
2 1089, filed December 29, 2006 in the Federal Court for the Southern District of
3 Ohio. The matter was never served and was dismissed.


4 *Bon-Aire v. Sorensen Research and Development Trust*. Case No. 07-cv-054-
5 S, filed January 2007 in the Federal Court for the District of Idaho. The matter was
6 never served and was dismissed.

7 *Husqvarna Outdoor Products, Inc. v. Sorensen Research and Development*
8 *Trust*. CIV. NO. CV106-160 in the Federal Court for the Southern District of
9 Georgia on October 30, 2006. The matter was never served and was dismissed.

10 *Sorensen et al v. International Trade Commission et al.* 427 F.3d 1375
11 (Fed.Cir., 2005). After the Federal Circuit ruled in patentee's favor, the parties
12 settled and dismissed.

13 DATED this February 14, 2008.

14
15 JENS ERIK SORENSEN, as Trustee of
16 SORENSEN RESEARCH AND DEVELOPMENT
TRUST, Plaintiff

17
18 
19 _____
20 Melody A. Kramer, Esq.
21 J. Michael Kaler
22 Attorney for Plaintiff
23
24
25
26
27
28